

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

ISMAEL ARREOLA and ISRAEL ARREOLA
Each Individually and on Behalf of All
Others Similarly Situated

PLAINTIFFS

vs.

No. 9:23-cv-50-MJT

SOUTHERN INDUSTRIAL CONTRACTORS,
LLC, and SAMUEL ESTIS

DEFENDANTS

JOINT MOTION FOR LEAVE TO APPEAR REMOTELY
AT RULE 16 MANAGEMENT CONFERENCE

Plaintiffs Ismael Arreola and Israel Arreola (“Plaintiffs”), each individually and on behalf of all others similarly situated, and Defendants Southern Industrial Contractors, LLC, and Samuel Estis (“Defendants”), by and through their undersigned counsel, for their Joint Motion for Leave to Appear Remotely at Rule 16 Management Conference (“Motion”), state and allege as follows:

1. The Court has scheduled a Rule 16 Case Management Conference on November 3, 2023, at 11:00 am before the Honorable Judge Michael J. Truncale. ECF No. 13.
2. Lead counsel for Plaintiffs, Colby Qualls of Forester Haynie, PLLC, is not local to Beaumont, Texas, and would be required to travel from Little Rock, Arkansas for the Conference.
3. Counsel for Defendants, Jacob Roussel of Breazeale, Sachse & Wilson, L.L.P., is also not local to Beaumont, Texas, and would be required to travel from Baton Rouge, Louisiana for the Conference.

4. Given these geographic limitations, the Parties now respectfully request that their counsel be granted leave to appear for the Conference remotely via teleconference or video conference.

5. The granting of the request would not prejudice any party and would help keep down the costs of litigation, saving the expense of counsel traveling to Beaumont, Texas.

WHEREFORE, premises considered, the Parties request this Court to grant their Motion to allow leave for counsel for both Parties to appear telephonically or via video conference at the Rule 16 Management Conference set for November 3, 2023.

Respectfully submitted,

**ISMAEL ARREOLA and ISRAEL
ARREOLA, Each Individually and on
Behalf of All Others Similarly
Situated, PLAINTIFFS**

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/s/ Colby Qualls

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**and DEFENDANTS SOUTHERN INDUSTRIAL
CONTRACTORS, LLC, and SAMUEL
ESTIS**

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CERTIFICATE OF SERVICE

I, the undersigned counsel, do hereby certify that one the date imprinted by the CM/ECF system, a copy of the foregoing MOTION was filed via the CM/ECF system, which will provide notice to the following attorneys of record:

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/s/ Colby Qualls

Colby Qualls